

Letter to Hon. Brian M. Cogan

February 17, 2022

Exhibit 1

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

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STUART FORCE individually and as personal
representative of the ESTATE OF TAYLOR FORCE,
et al.,

Case No. 1:20-cv-2578-BMC

Plaintiffs,
-against-

QATAR CHARITY; QATAR NATIONAL BANK and
MASRAF AL RAYAN,

Defendants.

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**PROPOSED PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO DEFENDANT QATAR CHARITY SEEKING JURISDICTIONAL DISCOVERY**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Local Civil Rules 26.2-26.4, and the Court's order dated February ___, 2022, Plaintiffs, by their undersigned counsel, request that Defendant Qatar Charity answers the Interrogatories set forth below in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules, and serves such answers on Plaintiffs' counsel at the email addresses set forth below within 30 days following the receipt of service of these Interrogatories.

DEFINITIONS

1. The Uniform Definitions in Discovery Requests set forth in Local Civil Rule 26.3, and the rules of construction set forth therein and in the Federal Rules of Civil Procedure, are all incorporated herein by reference.

2. The terms "You" and "Your" refer to Defendant Qatar Charity.

3. References to Defendant Qatar Charity include Defendant Qatar Charity operating under any other name including Nectar Trust.

4. The term "USD Account" means a financial account or subaccount that, during the Relevant Time Period, held deposits denominated in United States dollars, or from which

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February 17, 2022

Exhibit 1

Defendant Qatar Charity made payments that were received by the beneficiary in United States dollars.

5. The “Relevant Time Period” means January 1, 2011 through and including December 23, 2016.

INTERROGATORIES

1. Identify all USD Accounts maintained for You, in Your name, or for Your benefit during the Relevant Time Period by Defendant Qatar National Bank or Defendant Masraf al Rayan. Each such account must be identified by the name of the bank and the address of the branch at which the account was maintained, the type of account, the last 4 digits of the account number, the dates during which the account was maintained and the identity of Your principal contact person at each bank for each such account.

2. State the total number of USD Accounts maintained for You, in Your name, or for Your benefit during the Relevant Time Period by financial institutions anywhere in the world, including in that total the accounts identified in Your response to Interrogatory No. 1.

3. For each of the calendar years 2011 through 2016, state: (a) the percentage of Your total revenues from all sources that was received by You in United States dollars; and (b) the percentage of Your total expenditures for all purposes that was paid by You in United States dollars.

4. Describe any method by which You received or made inter-bank transfers denominated in United States dollars during the Relevant Time Period that did not involve the use of a correspondent, nostro, or vostro account located in the United States. Such description must identify any other financial institution involved in such inter-bank transfers (including the name and address of the financial institution) and state, for each of the calendar years 2011

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through 2016, the total United States dollar value of transfers You made utilizing each such method.

Dated: February __, 2022

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